



November 20, 2017

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**SENT VIA EMAIL, & ECF**

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**Re: AGL Industries, Inc. v. Continental Indemnity Company, et al.  
Civil Action No.: 1:17-cv-04179 (PKC)**

Counselors:

This office represents the Defendants Continental Indemnity Company ("Continental"), Applied Underwriters, Inc. ("AUI"), Applied Underwriters Captive Risk Assurance Company, Inc. ("AUCRA"), and Applied Risk Services, Inc. ("ARS"), in the above-captioned matter.

Enclosed, please find copies of the following motion papers:

- (1) Defendants' Notice of Motion to Transfer Venue Pursuant to Forum Selection Clauses and to Compel Plaintiff to Post a Bond for Security Under FRCP 65(C);
- (2) The Declaration of Claire M. Hankin in support of Defendants' Motion, dated November 20, 2017, together with Exhibits 1-10 annexed thereto; and
- (3) Defendants' Memorandum of Law in Support.

Pursuant to Judge Chen's Individual Practices and Rules, a copy of this cover letter will be filed through the Court's ECF system, and copies of the above motion papers will be electronically filed on the day the motion is fully briefed, January 29, 2017.

Thank you,

**WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP**

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*/s/ Claire M. Hankin*  
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Our File No.: 12548.00070

Cc: All Counsel of Record via Electronic Filing

Honorable Pamela K. Chen  
United States District Court, E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, New York 11201